

JACOB D. BUNDICK, ESQ.  
Nevada Bar No. 9772  
ALAYNE M. OPIE, ESQ.  
Nevada Bar No. 12623  
GREENBERG TRAURIG, LLP  
3773 Howard Hughes Parkway, Suite 400 N  
Las Vegas, NV 89169  
Telephone: (702) 792-3773  
Facsimile: (702) 792-9002  
Email: bundickj@gtlaw.com  
opiea@gtlaw.com

*Counsel for Defendant CIT Bank, N.A.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KATHRYN L. PAULI, formerly known as  
KATHRYN L. HODAPP,

Plaintiff,

v.

CIT BANK, N.A. and EQUIFAX  
INFORMATION SERVICES LLC,

Defendants.

Case No.: 2:17-cv-01556-APG-PAL

**STIPULATION FOR EXTENSION OF  
DISCOVERY DEADLINES**

**[SECOND REQUEST]**

Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case sixty (60) days, up to and including June 19, 2018. In addition, the parties request that the dispositive motions and pretrial order deadlines be extended for an additional ninety (90) days, as outlined herein. In support of this Stipulation and Request, the parties state as follows:

**A. Discovery Completed to Date.**

1. Plaintiff filed her Complaint on June 2, 2017.
2. Plaintiff filed her First Amended Complaint on July 19, 2017.
3. On August 7, 2017, Defendant CIT Bank, N.A. ("CIT") filed a Motion to Dismiss.
4. On August 21, 2017, Defendant Equifax ("Equifax") filed its Answer.
5. On August 21, 2017, Plaintiff filed her response to CIT's Motion to Dismiss.
6. On August 28, 2017, CIT filed its Reply in Support of Motion to Dismiss.

**GREENBERG TRAURIG, LLP**  
 3773 Howard Hughes Parkway  
 Suite 400 North  
 Las Vegas, Nevada 89169  
 Telephone: (702) 792-3773  
 Facsimile: (702) 792-9002

- 1           7.       On September 21, 2017, the Discovery Plan and Scheduling Order was entered.
- 2           8.       On September 29, 2017, CIT served its initial disclosures.
- 3           9.       On October 3, 2017, CIT served its first supplemental disclosures.
- 4           10.      On January 11, 2018, Plaintiff served her initial disclosures.
- 5           11.      On January 17, 2018, Plaintiff served CIT with requests for production of
- 6 documents, interrogatories, requests for admission. CIT served its responses on March 2, 2018.
- 7           12.      On January 18, 2018, CIT served Plaintiff with requests for production of documents,
- 8 interrogatories, requests for admission. Plaintiff served her responses on February 15, 2018.
- 9           13.      On January 19, 2018, CIT served its second supplemental disclosures.
- 10          14.      On January 19, 2018, Equifax served Plaintiff with requests for production of
- 11 documents, interrogatories, and requests for admission. Plaintiff has not yet served her responses.
- 12          15.      On January 24, 2018, Plaintiff served Equifax with requests for production of
- 13 documents, interrogatories, requests for admission. Equifax has not yet served its responses.
- 14          16.      On February 5, 2018, CIT noticed Plaintiff's deposition for February 14, 2018.
- 15          17.      On February 7, 2018, CIT noticed Plaintiff's deposition for February 19, 2018.
- 16          18.      On February 13, 2018, the parties submitted a Stipulation for Extension of
- 17 Discovery Deadlines [First Request]. The Court granted this Stipulation on February 21, 2018.
- 18          19.      On February 26, 2018, CIT served its third supplemental disclosures.
- 19          20.      On March 15, 2018, the Court denied CIT's Motion to Dismiss.
- 20          21.      On March 16, 2018, CIT noticed Plaintiff's deposition for April 6, 2018.

**B. Specific Description of Discovery that Remains to be Completed.**

- 22          1.       Depositions of Plaintiff, CIT, and Equifax.
- 23          2.       Depositions of any remaining witnesses; and
- 24          3.       Completion of outstanding written discovery and document productions.

**C. Reasons Why the Remaining Discovery Was Not Completed.**

25           The parties aver, pursuant to LR 6-1, good cause exists for the requested extension. As

26 shown above, the parties have been diligent in conducting discovery, and have been actively

27 engaged in settlement discussions, pending the Court's decision on CIT's Motion to Dismiss.

28

Given the Court's recent denial of CIT's Motion to Dismiss, the parties agree that the current deadlines restrict all parties from conducting the remaining necessary discovery. Specifically, the parties are coordinating schedules to conduct depositions of various parties. The parties also request a ninety day extension on the dispositive motion and pretrial order deadlines to allow time for continued settlement discussions.

**D. Proposed Discovery Deadlines.**

Event	Current Deadline	Proposed New Deadline
Close of Discovery	April 20, 2018	<b>June 19, 2018</b>
Dispositive Motions	June 19, 2018	<b>September 17, 2018</b>
Pretrial Order	July 19, 2018	<b>October 17, 2018</b>

**IT IS SO STIPULATED.**

DATED this 3rd day of April, 2018.

GREENBERG TRAURIG, LLP

/s/ Jacob D. Bundick, Esq.

JACOB D. BUNDICK, ESQ.

Nevada Bar No. 9772

ALAYNE M. OPIE, ESQ.

Nevada Bar No. 12623

3773 Howard Hughes Parkway, Suite 400 N  
Las Vegas, NV 89169

*Counsel for Defendant CIT Bank, N.A.*

DATED this 3rd day of April, 2018.

THE LAW OFFICE OF VERNON NELSON

/s/ Melissa Ingleby, Esq.

VERNON A. NELSON, JR., ESQ.

Nevada Bar No. 6434

MELISSA INGLEBY, ESQ.

Nevada Bar No. 12935

9480 S. Eastern Avenue, Suite 252  
Las Vegas, NV 89123

*Counsel for Plaintiff Kathryn L. Pauli*

DATED this 3rd day of April, 2018.

SNELL & WILMER, LLP

/s/ Bradley T. Austin, Esq.

BRADLEY T. AUSTIN, ESQ.

Nevada Bar No. 13064

3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169

*Counsel for Defendant*

*Equifax Information Services, LLC*

**IT IS SO ORDERED this 6th day of April, 2018.**

  
UNITED STATES MAGISTRATE JUDGE /  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), 45, I hereby certify that on April 3, 2018, a copy of the foregoing **STIPULATION FOR EXTENSION OF DISCOVERY DEADLINES [SECOND REQUEST]** was filed electronically via the Court's CM/ECF system. Notice of filing will be served on all parties by operation of the Court's CM/ECF filing system, and parties may access this filing through the Court's CM/ECF system.

/s/ Shayna Noyce

An employee of GREENBERG TRAURIG, LLP

**GREENBERG TRAURIG, LLP**  
3773 Howard Hughes Parkway  
Suite 400 North  
Las Vegas, Nevada 89169  
Telephone: (702) 792-3773  
Facsimile: (702) 792-9002